

## 2<sup>ND</sup> AMENDED EXCEPTION 88

### BellSouth Florida OSS Testing Evaluation

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January 28, 2002

#### EXCEPTION REPORT

An exception has been identified as a result of test activities associated with the Review of the Change Management Process (PPR1).

#### Exception:

**The BellSouth Change Control Prioritization Process does not allow CLECs to be involved in prioritization of all CLEC impacting Change Requests. (PPR1)**

#### Background:

The Change Control Prioritization (CCP) Process is the method used by both CLECs and BellSouth to rank the importance of both CLEC and BellSouth-initiated change requests. The Prioritization process is outlined in the description of Step Five of the overall Change Control process<sup>1</sup> in the BellSouth Change Control Process document<sup>2</sup>.

BellSouth also utilizes an internal prioritization process in conjunction with the CCP. The internal prioritization process occurs during Step Seven of the Change Control Process and includes review of the ranking determined by the CLECs during Step Five of the Change Control Process. The process is as follows:

- The Release Prioritization Team considers all changes from a variety of sources including the (external) Change Control Process, the Third Party Testing Team, the Regulatory Team, and the LCSC and prioritizes them into one master list.
- The Release Prioritization Team creates the master list and integrates the changes from the different sources using the following procedure: The number one priority change requested from each group is ranked in the master list from one to five with one being the highest. The team then ranks the number two priority change requests from each group from six to ten. The number three priority change requests are ranked from 11 to 15 and so forth.
- Additional factors are considered during the reprioritization process and may result in one customer group having a disproportionate number of Change Requests ranked at the top of the master list: These additional considerations are as follows:

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<sup>1</sup> Pages 28-29 and page 47.

<sup>2</sup> v. 2.3, May 18, 2001

- i. Regulatory changes that have been mandated and are due during this release cycle are prioritized first.
- ii. Change Requests that have related functions are given a higher priority than standalone changes.
- iii. Change Requests that are necessary for proper system operation are given a high priority.
- iv. Change Requests that are necessary for or concurrent with the implementation of additional change requests are given high priority.

During interviews with members of the BellSouth Internal Change Management Team conducted by KPMG Consulting, BellSouth asserted that all change requests included in the master prioritization list are related to the Wholesale portion of BellSouth's business.

The BellSouth Change Control Process<sup>3</sup> states that the BellSouth Change Control Process is designed to manage all change requests "that affect external users of BellSouth's Electronic Interface Applications, associated manual process improvements, performance or ability to provide service including defect/expedite notification."

**Issue:**

CLECs are unable to participate in the prioritization of change requests that originate from internal BellSouth organizations (Regulatory Team, Third Party testing Team, the LCSC, and Project Managers) that affect BellSouth's Wholesale business and therefore the CLEC Community. This policy inhibits one of the primary objectives of the CCP "to allow for mutual impact assessment and resource planning to manage and schedule changes."

**Impact:**

BellSouth's Internal Change Management Prioritization Process does not allow the CLEC community to participate in prioritization of change requests that affect CLEC Business. The CLEC Community's lack of participation in change requests that effect CLEC business could result in change requests important to the CLEC Community not being developed or implemented in a timely manner.

**BellSouth Response:**

The Change Control Prioritization Process does allow CLECs to be involved in the prioritization of CLEC impacting Change Requests. A CLEC impacting

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<sup>3</sup> Version 2.3, May 18, 2001

Change Request is defined as, “Any change that either requires the CLEC to modify the way it operates or causes it to rewrite system code.” Examples of this are:

- Business rule LSR field usage changes
- New functionality for an interface
- Change existing functionality for an interface
- New REQTYPs
- New field on the LSR form
- Electronic ordering of a product/service

This definition should impact the majority of the CLEC community, if not the entire community, since it is impossible to know how each CLEC has coded its systems.

CLEC impacting change requests may originate from various sources: the (external) Change Control Process, the Third Party Testing Team, the Regulatory Team, the LCSC, or Project Managers. It is transparent to the CLECs what internal BellSouth entity is the actual originator of a request since the originator is only identified, on the Change Request form, as BellSouth. Thus, CLECs have already prioritized Change Requests originated by internal BellSouth organizations in four separate Change Review Meetings. Mandates are not prioritized by the CLECs per the Change Control Process.

All such Change Requests should come through the Change Control Process providing the CLECs an opportunity to prioritize them. As a result of BellSouth’s commitment to provide CLECs the ability to participate in the prioritization of these requests, BellSouth has a better understanding of what is important to the CLEC community.

#### **BellSouth Amended Response:**

In an effort to address CLEC and KPMG concerns in CCP about release resource planning, BellSouth is offering the following proposal: BellSouth will allocate 40% of its annual release capacity for implementing CLEC change requests and/or CLEC-driven mandates. The remaining 60% will be used for implementing public switched network mandates such as NPA overlays and Number Pooling (5-10%), defects and maintenance (approximately 25%), and the remaining 25-30% for BellSouth features and change requests. This allocates more release capacity to CLEC requests including CLEC-driven mandates such as TN validation than to BellSouth requests. BellSouth will provide preliminary unit measurements estimates accompanying each change request that can be used by the CLECs during prioritization. BellSouth will also track the capacity per the above categories and provide a YTD percent capacity used for CLEC requests. This report will be provided at CCP on a quarterly basis, beginning with calendar year 2002.

#### **KPMG Consulting Amendment:**

KPMG Consulting has the following concerns related to BellSouth’s Amended Response to Exception 88:

1. The BellSouth proposal does not address the issue of BellSouth's definition of "CLEC Impacting" change requests. KPMG Consulting has expressed concern that the BellSouth Change Management Process does not provide CLECs the ability to view and/or prioritize all BellSouth Change Requests that impact CLEC business operations. BellSouth defines CLEC Impacting as "Any change that requires the CLEC to modify the way they operate or to rewrite system code." CLECs do not view and/or prioritize change requests deemed by BellSouth to be "non-CLEC Affecting." KPMG Consulting remains concerned that the BellSouth definition of "CLEC Affecting" does not include issues that impact CLEC business operations and does not allow CLECs to conduct mutual impact assessment and resource planning – a stated objective of the BellSouth Change Control Process.<sup>4</sup>
2. The BellSouth proposal states that 40% of the BellSouth annual release capacity will be allocated to the implementation of CLEC Change Requests and "CLEC-driven mandates" The BellSouth proposal does not provide a definition of a "CLEC-driven mandate." KPMG Consulting cannot respond to this portion of the proposal without an adequate understanding of the BellSouth definition for "CLEC-driven mandate."
3. The BellSouth proposal states that 25% of BellSouth annual release capacity will be allocated to the implementation of maintenance and defect change requests. BellSouth states that during the period June 24, 1999 through October 15, 2001, 47% (240 of 511 Change Requests)<sup>5</sup> of Change Requests were classified as defects. KPMG Consulting is concerned that 25% of the BellSouth annual release capacity will not be sufficient to correct defects and conduct maintenance of BellSouth production systems.
4. The BellSouth proposal does not state what mechanism BellSouth will use to determine YTD percent capacity used. Further, BellSouth does not state if this information will be independently verifiable. KPMG Consulting cannot respond to this portion of the proposal without a full understanding of this process.
5. KPMG Consulting will require review of complete process documentation as well as resolution of the above issues before BellSouth proposal can be evaluated.

### **BellSouth Response:**

1. BellSouth has submitted Change Request, CR0569, to clarify the definition of "CLEC Affecting." The proposed definition states, "Any change that requires the CLEC to rewrite system code and involves the following types of business rule

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<sup>4</sup> Version 2.6, September 10, 2001

<sup>5</sup> Attachment included in E-mail, From: [Change.Control@bridge.bellsouth.com](mailto:Change.Control@bridge.bellsouth.com); To: CCP Distribution list; Subject: Response to AT&T CR Analysis; October 18, 2001

changes: Change to an R-C-O table in the BBR; a change to a valid entry in a field; a change to data characteristics of a field; or an additional field to a form or screen.” This was introduced in the CLEC Meeting on December 12, 2001 and will allow CLECs the ability to view and/or prioritize all BellSouth Change Requests that impact CLEC business operations.

2. CLEC-driven mandates are requests initiated by one or more CLECs through a regulatory channel that result in changes to BellSouth’s systems via Orders. Generally, these Orders have date-specific requirements, and address such issues as pre-ordering and/or ordering requirements, for new services, industry standards, reporting requirements, or required new inter-company processes.
3. The CR Analysis Report reflects a total of 240 Type 6 Change Requests. The following is a breakdown of the 240 Change Requests that were submitted as defects through October 15, 2001:

Submitted CRs as Defects	240
Cancelled Defects CRs	- 80
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	160
Documentation	69
System-related	91

The total number of all CRs, including defects, cancelled is 167. This leaves a total of 344 active CRs.

Since only 26% (91 of 344 Change Requests) of the Type 6 Change Requests were identified as being system-related, BellSouth believes that 25% of the annual release capacity is sufficient to correct defects and conduct maintenance of BellSouth’s production system. The 25% release capacity allocation is inline with BellSouth’s 2001 track record for defects and maintenance.

4. At the end of each quarter BellSouth will provide a report listing the percent YTD capacity used during the quarter. An example can be seen in the enclosed sample quarterly report attachment. The process is effective January 2002 with Release 10.3.1 and described in the attached proprietary Word document. BellSouth is receptive to independent verification by a neutral third party.
5. Please see all proprietary attachments.

## **KPMG Consulting Second Amendment**

KPMG Consulting has reviewed the BellSouth response and associated process documentation. KPMG Consulting’s opinion on each issue is described below:

1. KPMG Consulting has reviewed Change Request CR0569 and found that BellSouth's proposed definition of CLEC Impacting only addresses some changes to the BellSouth Business Rules for Local Ordering (BBR-LO) or changes that cause a CLEC to rewrite system code. The definition fails to address changes that impact CLEC business operations but do not require coding changes. The failure of the CLEC Impacting definition to include business processes precludes CLECs from conducting mutual impact assessment and resource planning for interface changes that do not require code to be rewritten.
2. KPMG Consulting understands the explanation of CLEC-driven mandate. In addition, KPMG Consulting is aware that BellSouth is currently engaged with members of the CLEC Community to determine how CLEC-driven mandates will be applied to capacity allocation. KPMG Consulting will reserve comment on this issue until BellSouth and the CLEC Community reach consensus.
3. KPMG Consulting agrees with the BellSouth analysis of this issue. However, KPMG Consulting remains concerned that future defect corrections could comprise more than 25 % of annual release capacity. Please see item 5 below.
4. KPMG Consulting understands the capacity reporting process has been modified from the process described above through discussions between BellSouth and the CLEC Community.
5. KPMG Consulting has reviewed BellSouth internal process documentation and found that it does not address capacity allocation for Industry Releases (Type 3 Changes). Further, it does not provide contingency processes to address the possibility that predetermined capacity allocations may not be sufficient to address necessary changes to the BellSouth OSS (e.g., CLEC Driven mandates that comprise more than 40% of annual release capacity, Defect corrections that comprise more than 25% of annual release capacity). KPMG Consulting also needs to understand what if any internal process changes will occur as a result the BellSouth proposal.